Supreme Court, U.S.
FILED
APR 20 1982
ALEXANDER L. STEVAS
CLERK

No. 81-1865

IN THE

Supreme Court of the United States

OCTOBER TERM, 1981

DEVEX CORPORATION, TECHNOGRAPH, INC., WILLIAM C. McCOY, JR., individually and as Executor of the Estate of WILLIAM C. McCOY, deceased, THEODORE A. TE GROTENHUIS, FREDERICK B. ZIESENHEIM, MARJORIE TE GROTENHUIS, and KATHARINE M. BASSETT,

Petitioners,

v.

GENERAL MOTORS CORPORATION,

Respondent.

REPLY BRIEF IN SUPPORT OF PLAINTIFFS' CROSS-PETITION FOR CERTIORARI

DAVID F. ANDERSON
350 Delaware Trust Building
Wilmington, Delaware 19899
(302) 658-6771

WILLIAM C. McCOY, JR.
1200 Leader Building
Cleveland, Ohio 44114
(216) 579-1700

LYNN ALSTADT
301 Fifth Avenue
Pittsburgh, Pennsylvania 15222
(412) 471-1590
Of Counsel

SIDNEY BENDER
AARON LEWITTES
585 Stewart Avenue
Garden City, New York 11530
(516) 222-0147

FREDERICK B. ZIESENHEIM
301 Fifth Avenue
Pittsburgh, Pennsylvania 15222
(412) 471-1590
Attorneys for Petitioners

In the

Supreme Court of the United States

OCTOBER TERM, 1981

No. 81-1865

DEVEX CORPORATION, et al.,

Petitioners,

v.

GENERAL MOTORS CORPORATION,

Respondent.

REPLY BRIEF IN SUPPORT OF PLAINTIFFS' CROSS-PETITION FOR CERTIORARI

GM's one-page Brief in Opposition fails to take issue with the particular legal principle set forth in plaintiffs' cross-petition (PCP 11) and the specific facts applicable thereto (*id.* 4-10). Instead GM attempts to deceive this Court by stating falsely and without support that plaintiffs' cross-petition depends "upon facts which . . . have no record support . . .".

If GM's petition in No. 81-1661 is granted with respect to the reasonable royalty on infringing bumper manu-

facture, the Court should grant plaintiffs' cross-petition on that issue in Case No. 81-1865.

Respectfully submitted,

DAVID F. ANDERSON
350 Delaware Trust Building
Wilmington, Delaware 19899
(302) 658-6771

WILLIAM C. McCOY, JR.
1200 Leader Building
Cleveland, Ohio 44114
(216) 579-1700

LYNN ALSTADT
301 Fifth Avenue
Pittsburgh, Pennsylvania 15222
(412) 471-1590
Of Counsel

SIDNEY BENDER
AARON LEWITTES
585 Stewart Avenue
Garden City, New York 11530
(516) 222-0147

FREDERICK B. ZIESENHEIM
301 Fifth Avenue
Pittsburgh, Pennsylvania 15222
(412) 471-1590
Attorneys for Petitioners

Dated: April 19, 1982